

## REMARKS

The foregoing amendments and the following remarks are responsive to the Final Office Action mailed May 6, 2004. Applicants respectfully request reconsideration of the present application.

Claims 1-19, 22-29, 31-36, and 38-70 are pending. Claim 70 has been amended. Please cancel claims 13 and 45. Therefore, claims 1-12, 14-19, 22-29, 31-36, 38-44, and 46-70 are presented for examination.

The Examiner objected to claim 45. Applicants have cancelled claim 45. Applicants respectfully request withdrawal of this objection.

The Examiner further objected to the drawings, for failing to illustrate the "cache lookup key" element. The Examiner is respectfully referred to Figure 4C, which illustrates the Cache process, and corresponding discussion on page 18, which reads as follows:

Based on the data from step 426, the Photo Cache is searched at step 431 to see whether a previously-computed photo exists. In other words, has this same translation operation been performed previously on exactly the same photo for the same device (or a device requiring the same translation), and that translated photo still remains in the cache. In the currently-preferred embodiment, each cache entry is identified by hashing first on the photo ID (e.g., long integer) and then on the device type (e.g., text string) at a particular device resolution (e.g., text string), as indicated by step 432.

Applicants therefore submit that the "cache lookup key" is illustrated in the existing figures, and discussions, and no new matter was added. Therefore, Applicants respectfully request withdrawal of the objection to the Drawings.

The Examiner further rejected claims 1, 7, 8, 36, 38, 67, 69, and 70 under 35 USC 112, first paragraph.

With respect to claims 1, 8, 67, and 70, the Examiner objects to the addition of a cache lookup key. However, the term cache lookup is well known in the art. In general, data stored in the cache is identified based on a look-up key of some sort. This is supported by Examiner's own cited reference, Stewart, U.S. Patent No. 6,389,460. In memory caches, the lookup key is the memory address being accessed. All caches have such "lookup keys." The claim language, "generating a cache lookup key based on the identity of the particular photographic image and the format that is desired" is supported by the above quoted paragraph, which notes that "each cache entry is identified by hashing first on the photo ID (e.g., long integer) and then on the device type (e.g., text string) at a particular device resolution." This "identification" of a cache entry is the cache lookup key. Therefore, Applicants respectfully submit that the Specification, as originally submitted, supports the addition of the claim language. Applicants therefore respectfully request the withdrawal of the rejection under 35 USC 112, first paragraph.

With respect to claim 13 and 45, the Examiner objected to the addition of the limitation that "photographic image comprises multiple frames." Applicants have cancelled claims 13 and 45.

Examiner rejected claims 1-5, 7, 9, 11-19, 24-27, 31, 32, 36, 38-43, 45-53, 56-59, 62, 63 and 67-69 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. The Examiner notes that Huang does not teach generating a cache lookup key based on the identity of the particular photographic image and the format specified by the Target device. The Examiner references Stewart for these elements. Stewart discusses techniques for storing objects (e.g., images) in and retrieving objects

from a storage device (e.g., image store) in a rapid and efficient manner. Stewart discusses the image retrieval as follows:

The operation of the database according the invention is as follows. Data is retrieved when an application or a user requests it using keys which identify the data. For example, the keys can include URL, cookie, authorization and image type. Data is written to the location identified by its associated keys.

(Stewart, column 11, lines 1-4). Stewart does not teach or suggest separately caching the image with various formats. In fact, Stewart does not discuss format-based differentiation of images. Rather, Stewart forms an image identification string by concentrating the URL, merged cookies, and authorizations (Figure 5, block 508). Stewart does not teach or suggest using a desired format in generating a lookup key. Therefore, Stewart does not teach or suggest "generating a cache lookup key based on the identity of the particular photographic image and the format that is desired" as recited in claim 1. Therefore, claim 1, and claims 2-12, and 14-35 which depend on it, are obvious over Huang in view of Stewart.

Similarly, claim 36 recites in part "the cache memory having a cache lookup key based on the identity of the particular photographic image and the format that is desired." As noted above, Stewart does not teach or suggest a cache lookup key based on the identity and the format of an image. Therefore, claim 36, and claims 37-44 and 46-66 which depend on it, are not obvious over Huang in view of Stewart.

Claim 66 recites in part " a cache lookup logic to use a cache lookup key based on an identity of the particular piece of media and parameters of the requesting client." As noted above, Stewart does not teach or suggest using the requesting client's

parameter information, either for storage or for lookup. Therefore, claim 67, and claims 68-70 which depend on it, are not obvious over Huang in view of Stewart.

Examiner rejected claims 6 and 41 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of U.S. Patent No. 6,202,097 issued to Foster, et al. Examiner rejected claims 8 and 70 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of U.S. Patent No. 6,289,375 issued to Knight, et al. Examiner rejected claims 12 and 44 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of what is well known in the art. Examiner rejected claims 10, 22, 23, 54 and 55 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of U.S. Patent No. 6,141,686 issued to Jackowski, et al. Examiner rejected claims 28 and 60 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of the Applicant's admitted prior art. Examiner rejected claims 29, 33-35, 61 and 64-66 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al. in view of U.S. Patent No. 6,389,460 issued to Stewart, et al. and further in view of U.S. Patent No. 6,411,685 issued to O'Neal.

The additional references cited by the Examiner also do not teach or suggest "generating a cache lookup key based on the identity of the particular photographic

image and the format that is desired." Therefore, for the same reasons argued above with respect to the combination of Huang and Stewart, the claims are not obvious over these references.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all pending claims are in condition for allowance. Such allowance is respectfully requested.

If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to contact Judith A. Szepesi at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

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